

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

NAVY SEALs 1-3, et al.,

Plaintiffs,

v.

LLOYD J. AUSTIN, III in his official capacity as  
United States Secretary of Defense, et al.,

Defendants.

Case No. 4:21-cv-01236-O

**DEFENDANTS' FIRST MOTION TO COMPEL**

Defendants respectfully request that this Court order Plaintiffs to respond fully and completely to Defendants' First Set of Interrogatories and First Set of Requests for Productions in accordance with the proposed order, and for the reasons set forth in the accompanying memorandum and supporting materials.

Dated: August 18, 2022

Respectfully submitted,

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General

ALEXANDER K. HAAS  
Director, Federal Programs Branch

ANTHONY J. COPPOLINO  
Deputy Director

/s/ Amy E. Powell  
ANDREW E. CARMICHAEL (VA Bar. No. 76578)  
AMY E. POWELL  
Senior Trial Counsel  
STUART J. ROBINSON  
Senior Counsel  
ZACHARY A. AVALLONE  
LIAM C. HOLLAND  
Trial Attorney

United States Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street, N.W.  
Washington, DC 20005  
Tel: (202) 514-3346  
Fax: (202) 616-8470  
Email: Andrew.e.carmichael@usdoj.gov

*Counsel for Defendants*

CERTIFICATE OF CONFERENCE

Counsel for Defendants conferred with Plaintiffs' counsel regarding this motion through email and telephone on multiple occasions between July 20, and August 16, 2022. Plaintiffs' counsel indicated that they oppose the relief requested in Defendants' motion. *See* DEX13 (App.689-90)

/s/ Amy E. Powell

Amy Elizabeth Powell  
Counsel for Defendants